

Nathan Dooley (SBN 224331)
 ndooley@cozen.com
 Adam C. Bonin (*Pro hac vice*)
 abonin@cozen.com
 COZEN O'CONNOR
 601 South Figueroa Street
 Suite 3700
 Los Angeles, California 90017
 Telephone: 213.892.7900
 Toll Free Phone: 800.563.1027
 Facsimile: 213.892.7999

Attorneys for Plaintiffs
 Kos Media and Markos Moulitsas Zúniga

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

KOS MEDIA, LLC and
 MARKOS MOULITSAS ZÚNIGA,

PLAINTIFFS,

VS.

RESEARCH 2000 AND DELAIR D. ALI,

DEFENDANTS.

Case No.: C10-02894 MEJ

[Assigned for all purposes to
 Hon. Marie –Elena James, Courtroom B,
 15th Floor]

JOINT STATUS REPORT,
 REQUEST AND STIPULATION
 FOR PROPOSED CONTINUANCE
 OF DATE for CASE
 MANAGEMENT CONFERENCE

Current Hearing Date: Dec. 02, 2010
 Requested Hearing Date: Jan. 17, 2010

TO THE COURT, ALL THE PARTIES AND THEIR ATTORNEYS OF
 RECORD:

By and through their undersigned counsel, Plaintiffs Kos Media and Markos Moulitsas Zúniga (collectively “Plaintiffs”), and Defendants RESEARCH 2000 AND DELAIR D. ALI (collectively “Defendants”) respectfully submit the following Status Report, Request and Stipulation for Continuance of the hearing date in the above captioned matter for the Case Management Conference currently set for Thursday December 02, 2010.

//

STATUS

The parties have reached an agreement as to the contours of a proper settlement but are still in the process of determining whether the execution of the proposed terms is feasible. The parties will know whether execution is feasible within one week. Accordingly, the parties hereby seek through their undersigned counsel a short continuance of the instant case management conference, currently on calendar for Thursday December 02, 2010.

In view of the foregoing, IT IS HEREBY STIPULATED and agreed by and between Plaintiffs and Defendants that the instant Case Management Conference shall be continued until January 17, 2011.

GOOD CAUSE

Good cause exists to grant the instant Request and allow the parties additional time to execute the contemplated settlement for the following reasons:

1. The parties have negotiated a settlement in good faith and it would be a waste of judicial resources for the Court to intervene at this stage when all that needs to be seen is whether the contemplated settlement is indeed feasible.

2. The contemplated settlement would likely result in a final and complete resolution of the instant controversy.

3. If the contemplated terms are not feasible, undersigned counsel may be able to reach an alternative arrangement without burdening the Court, and in any event, the most prudent present course is to wait and see whether the contemplated settlement will result in a final and complete resolution of the instant controversy.

4. The parties request a hearing date of January 17, 2011 in view of the fact that Plaintiffs' counsel will begin a five day jury trial in Los Angeles on January 03, 2010 and in contemplation of the pending holidays in December.

//

//

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28